Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Allocations and Service Rules for the 71-76 GHz, 81-86 GHz and 92-95 GHz Bands	)	WT Docket No. 02-146
	)	
	)	
Loea Communications Corporation Petition for Rulemaking	)	RM-10288
	)	

Reply Comments of Comsearch

Comsearch hereby respectfully submits the following reply comments in the above captioned proceeding to clarify two points discussed in our comments.

Unlicensed Operation

In our comments, we stated that "if the Commission opts to allocate some portion of these bands for unlicensed use, other than for low power indoor devices, some form of device registration or frequency coordination should be required." This statement was meant to acknowledge the possibility that the Commission *might* allocate the bands for unlicensed usage and the impracticality of registering/coordinating indoor consumer devices that might use the band. However, the Commission should not read this statement to mean that Comsearch *favors* allocation of an unlicensed indoor underlay in the 71-76 and 81-86 GHz bands. On the contrary, Comsearch agrees with the comments

proposing site-by-site licensing with frequency coordination in the 71-76 and 81-86 GHz bands, with the 92-95 GHz band being allocated for unlicensed usage. In this scenario, Comsearch still favors developing a registration/coordination process for outdoor unlicensed devices in the 92-95 GHz band.

Accuracy of Site Geographic Coordinates

In our comments we recommended recording site coordinates to the nearest tenth of a second of latitude and longitude. Inexpensive GPS receivers equipped with the Wide Area Augmentation System (WAAS) are capable of this level of accuracy and the short path lengths and narrow antenna beamwidths used in these bands may result in too much error or uncertainty in interference analysis if coordinates are rounded to the nearest second. We wish to clarify that we are aware that WAAS is not currently deployed nationwide, and that only a large percentage (but not all) GPS/WAAS location measurements will have accuracy within 3 meters. Based on these considerations we now modify our recommendation regarding the coordinate accuracy requirement that should be stated in the rules.

We recommend that the rules should continue to require coordinates to be specified with nearest-second accuracy as a minimum, but that a note should be added encouraging applicants to use surveying techniques that would provide tenth-of-a-second accuracy whenever possible. We recognize that in order to minimize the difficulty and expense of installing these links, it is desirable to determine the antenna locations with GPS rather than with more sophisticated site surveying techniques. Nevertheless, because many or even most GPS readings will have tenth-of-a-second accuracy,

particularly in the future as GPS technology improves, we continue to favor collecting the coordinates to this accuracy on the FCC application forms and in the ULS database. Better coordinate accuracy will facilitate an increased density of link deployments.

Respectfully Submitted,

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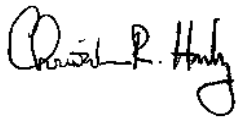

Prepared by:_____
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